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4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

ATTORNEYS

JUSTIN M. REILLY, ESQ.  
KEITH E. WILLIAMS, ESQ.

PARALEGALS

ROSA COSCIA  
CATALINA ROMAN

**Via: SDNY ECF**

**April 16, 2025**

Honorable Judge Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 1506  
New York, NY 10007

**Re: *Guzman Aguilar v. Trinidad Motors Corp., et al.*; 1:24-cv-08413-RA-SLC**

Dear Hon. Judge Abrams,

I represent Plaintiff in this FLSA action. I write pursuant to Your Honor's Individual Practice Rules to request an extension of the time for Plaintiff to file a motion for default judgment. This is Plaintiff's first such request and no other deadlines will be affected.

On April 3, 2025, Your Honor extended Defendants' time to file a response to Plaintiff's Complaint to no later than April 17, 2025 and, if no response was filed, directed Plaintiff to seek a default judgment no later than April 30, 2025. *See* D.E. 15. The reason for this extension request is due to my planned family vacation, which will commence tomorrow and continue through April 27, 2025. As such, Plaintiff respectfully requests that the deadline to file a Motion for Default Judgment be extended from April 30, 2025 up to and including May 16, 2025.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Keith E. Williams", is written over a horizontal line.

Keith E. Williams, Esq.

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Ronnie Abrams", is written over a horizontal line.

Hon. Ronnie Abrams  
April 17, 2025